



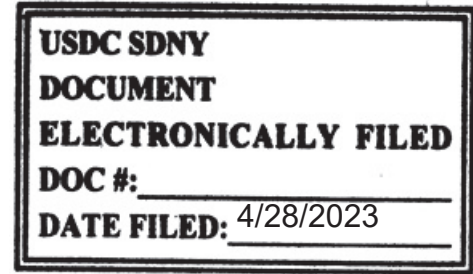
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April 28, 2023

VIA ECF

Honorable Robert W. Lehrburger
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007



Re: *Jasmine Baldwin v. Computer Generated Solutions, Inc.*
Case No. 1:23-cv-00128-JHR

Dear Magistrate Judge Lehrburger:

This firm represents Defendant Computer Generated Solutions, Inc. (“Defendant” or “CGS”) in the above-referenced matter. We write, jointly with Plaintiffs and pursuant to Rule 1.F. of Your Honor’s Individual Rules of Practice in Civil Cases, to respectfully request an adjournment of current deadlines and a short stay of proceedings while the parties continue to discuss settlement. On April 24, 2023, the parties filed a joint letter to Judge Rearden (Dkt. 44) requesting an adjournment of current deadlines and a short stay of proceedings while the parties continue to discuss settlement. The parties’ respective counsel have had multiple discussions regarding settlement and have just agreed on the exchange of an anonymized sampling of data for certain members of the putative class. The parties believe that the production of this data will facilitate further meaningful settlement discussions. Defendant is in the process of preparing this data, which is voluminous, and intends to produce same to Plaintiffs as soon as possible.

In light of the foregoing developments, the parties respectfully request a brief stay of proceedings, including the upcoming settlement conference currently scheduled for May 2, 2023 (and the corresponding deadline for the parties’ to submit a pre-settlement statement on April 25, 2023), and Defendant’s deadline to respond to the Complaint on May 16, 2023. Once Plaintiffs’ counsel has had an opportunity to review and analyze the data Defendant is preparing, the parties are hopeful that a settlement conference before Your Honor, if necessary, will be more productive with respect to helping the parties reach a resolution. This is Defendant’s third request for an extension of time of its deadline to respond to the Complaint, and Plaintiffs consent and join Defendant’s request.

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Respectfully submitted,

/s/ Paul Piccigallo

Paul R. Piccigallo
Shareholder

cc: Counsel of Record (via ECF)

Request granted in part. The settlement conference and pre-conference statement deadline are adjourned sine die. By June 16, 2023, the parties shall file a joint status report and indicate whether they believe a settlement conference would be productive at that time. This matter has been referred to me for settlement only; accordingly, the request for extension of time to answer must be acted on by the District Judge.

SO ORDERED:

4/28/2023



HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE